BANKRUPTCY—TITLE OF TRUSTEE—LIENS INVALID AS TO CREDITORS—ATTACHMENTS—PRESERVATION OF LIENS—COUNSEL FEES.—In *Receivers of Va. I. C. & C. Co.* v. *Staake* (C. C. A., Fourth Circuit, on appeal from the District Court of the U. S. for W. D. of Va.,) 133 Fed. 717, the following is the syllabus:

1. The rule that the trustee takes the estate of the bankrupt in the same plight as the bankrupt held it is not applicable to liens which, although valid as to the bankrupt, are invalid as to creditors.

2. Bankr. Act July 1, 1898, c. 541, sec. 67f, 30 Stat. 565 (U. S. Comp. St. 1901, p. 3450), provides that attachments and other liens obtained against an insolvent within four months prior to the filing of a petition in bankruptcy against him shall be void in case he is adjudged a bankrupt, and the property affected by such attachments or liens shall be released from the same, and pass to the trustee as part of the estate of the bankrupt, unless the court shall order the lien to be preserved for the benefit of the estate. Creditors of an insolvent attached, under the Virginia law giving them that right, property which the insolvent had conveyed, but deeds to which had not been recorded. After the attachment the deeds were recorded, and within four months from the attachment the insolvent was adjudged a bankrupt. *Held*, that the attachment liens could be preserved for the benefit of the bankrupt's estate, although the property subject thereto did not belong to the bankrupt, except as to the attaching creditors, and could not have been reached by the trustee, except for the attachments.

3. It was proper for the bankruptcy court to allow attachment creditors who had obtained liens on property which the trustee could not have otherwise reached a reasonable compensation for attorney's fees, on ordering the attachment liens preserved for the benefit of the estate.

CRIMINAL LAW—CHANGES IN CRIMINAL PRACTICE.—The changes in criminal practice suggested by our correspondent, Mr. S. B. Whitehead, in our January number (10 Va. Law Reg. 843), have attracted the attention of the Editor of the *National Corporation Reporter*, who says that the argument is logical, but not likely to meet the approval of the members of the Criminal Court bar.

PERSONAL RIGHTS—PERFORMING MAJOR OPERATION WITHOUT PATIENT'S CONSENT.—In the case of *Pratt* v. *Davis*, reported in *Chicago Legal News*, February 18, 1905, the Appellate Court of Illinois, First District, held that a free citizen's first and greatest right, which underlies all others—the right to the inviolability of his person; in other words, the right to himself—is the subject of universal acquiescence, and this right necessarily forbids a surgeon or physician, however skillful or eminent, who has been asked to examine, diagnose, advise and prescribe, to violate, without permission, the bodily integrity of his patient by a major or capital operation, placing him under an anæsthetic for that purpose and operating on him without his consent or knowledge; that while it may be assumed, for the purposes of this case, that as the husband is the head of the family and naturally the protector and guardian of an insane wife's interests, consent by him, implied or expressed, would justify the defendant and avoid the liability charged against him in this action, to make good this defense, after it has appeared that no consent of the patient herself can be shown, the defendant